

EXHIBIT 2

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO DEFENDANT UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S THIRD SET OF
REQUESTS FOR ADMISSION (NOS. 9-23)**

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that on April 19, 2017, a lawyer for Waymo inspected Uber's design files at 425
3 Market Street in San Francisco, California.

4
5 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

6 Subject to and without waiving its objections, Waymo responds as follows:

7 Admitted.
8

9 **REQUEST FOR ADMISSION NO. 13:**

10 Admit that on May 24, 2017, Waymo's lawyers inspected Uber's facilities at 737 Harrison
11 Street, 120 Perry Street, and 777 Harrison Street in San Francisco, California.

12
13 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

14 Subject to and without waiving its objections, Waymo responds as follows:

15 Admitted.
16

17 **REQUEST FOR ADMISSION NO. 14:**

18 Admit that on May 26, 2017, a lawyer for Waymo inspected Uber's source code at 425
19 Market Street in San Francisco, California.

20
21 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

22 Subject to and without waiving its objections, Waymo responds as follows:

23 Admitted.
24

25 **REQUEST FOR ADMISSION NO. 15:**

26 Admit that on May 31, 2017, Waymo's lawyers inspected emails belonging to Uber
27 engineers at 425 Market Street in San Francisco, California.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

2 Subject to and without waiving its objections, Waymo responds as follows:

3 Admitted.

4
5 **REQUEST FOR ADMISSION NO. 16:**

6 Admit that on June 6, 2017, a lawyer for Waymo inspected emails belonging to Uber
7 engineers and technical documents at 425 Market Street in San Francisco, California.

8
9 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

10 Subject to and without waiving its objections, Waymo responds as follows:

11 Admitted.

12
13 **REQUEST FOR ADMISSION NO. 17:**

14 Admit that on June 9, 2017, Waymo's lawyers inspected Anthony Levandowski's work
15 station and Uber-issued smartphone at 555 Market Street in San Francisco, California.

16
17 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

18 Subject to and without waiving its objections, Waymo responds as follows:

19 Admitted.

20
21 **REQUEST FOR ADMISSION NO. 18:**

22 Admit that on June 12, 2017, Waymo's lawyers inspected the Uber-issued computers of
23 Gaetan Pennecot, Daniel Gruver, and Anthony Levandowski at 737 Harrison Street in San
24 Francisco, California.

25
26 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

27 Subject to and without waiving its objections, Waymo responds as follows:

28 Admitted.

1 **REQUEST FOR ADMISSION NO. 19:**

2 Admit that on June 13, 2017, a lawyer for Waymo inspected emails belonging to Uber
3 engineers and technical documents at 425 Market Street in San Francisco, California.
4

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

6 Subject to and without waiving its objections, Waymo responds as follows:

7 Admitted.
8

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that on June 20, 2017, a lawyer for Waymo inspected Uber's facility at 50 33rd
11 Street in Pittsburgh, Pennsylvania, including the computers of Scott Boehmke and John Bares, and
12 the work spaces of several LiDAR hardware engineers, including Scott Boehmke and Jim
13 Gasbarro.
14

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

16 Subject to and without waiving its objections, Waymo responds as follows:

17 Denied.
18

19 **REQUEST FOR ADMISSION NO. 21:**

20 Admit that on June 28, 2017, Waymo's lawyers inspected emails belonging to Uber
21 engineers and a partial backup of Anthony Levandowski's computer at 425 Market Street in San
22 Francisco, California.
23

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

25 Subject to and without waiving its objections, Waymo responds as follows:

26 Admitted.
27
28

1 **REQUEST FOR ADMISSION NO. 22:**

2 Admit that on June 29, 2017, Waymo's lawyers inspected the Uber-issued computers of
3 Max Levandowski and Will Treichler and Uber's design files at 737 Harrison Street in San
4 Francisco, California.

5
6 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

7 Subject to and without waiving its objections, Waymo responds as follows:

8 Admitted.

9
10 **REQUEST FOR ADMISSION NO. 23:**

11 Admit that on June 29, 2017, Andrew Wolfe inspected Uber's design files at 737 Harrison
12 Street in San Francisco, California, on behalf of Waymo.

13
14 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

15 Subject to and without waiving its objections, Waymo responds as follows:

16 Admitted.

17
18 DATED: August 21, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

19
20 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC